

Exhibit 16

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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5 MONIQUE RUSSELL, JASMINE
6 RIGGINS, ELSA M. POWELL, and
7 DESIRE EVANS,

 Plaintiffs, Case No. 18-5629

7 v.

8 EDUCATIONAL COMMISSION FOR
9 FOREIGN MEDICAL GRADUATES,
10 Defendants.

9 -----

10 Washington, D.C.

11 Friday, September 12, 2019

12 Deposition of JASMINE RIGGINS, a witness
13 herein, called for examination by counsel for the
14 Defendant in the above-entitled matter, pursuant
15 to notice, the witness being duly sworn by Barbara
16 DeVico, a Notary Public in and for the District of
17 Columbia, taken at the offices of MORGAN, LEWIS &
18 BOCKIUS, LLP, 1111 Pennsylvania Avenue,
19 Washington, D.C., at 11:33 a.m.,
20 Thursday, September 12, 2019, and the proceedings
21 being taken down by Stenotype by BARBARA De VICO,
22 CRR, RMR, and transcribed under her direction.

23

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25

1 as Jasmine Riggins, correct?

2 A. Yes.

3 Q. Is your birthday July 4, 1992?

4 A. Yes.

5 Q. And how old would that make you?

6 A. 27.

7 Q. Are you currently married?

8 A. No.

9 Q. Do you have any children?

10 A. Yes.

11 Q. How many children?

12 A. Three.

13 Q. And can you give me their names and
14 their current ages?

15 A. Santana is 10, Messiah is 10, Taniya
16 will be two next month.

17 Q. Are Santana and Messiah both boys?

18 A. Yes.

19 Q. And Taniya is a girl?

20 A. Yes.

21 Q. And earlier this year in your
22 deposition in the Dimensions case you indicated
23 that you were engaged. Is that status the same, or
24 has it changed?

25 A. It's the same.

1 Q. What's your current address?

2 A. 3699 J Street, Apartment 301, N.E.,
3 Washington, D.C. 20019.

4 Q. How long have you lived there?

5 A. Almost a year.

6 Q. You have a high school GED, is that
7 right?

8 A. Yes.

9 Q. Do you have any other subsequent
10 education beyond that?

11 A. No.

12 Q. Are you currently employed?

13 A. Yes.

14 Q. Where is that?

15 A. Potbelly Sandwich Shop.

16 Q. When did you start working there?

17 A. April of this year.

18 Q. And you've worked at Potbelly's
19 since April of this year?

20 A. Yes.

21 Q. And how many hours a week,
22 approximately, do you work?

23 A. About 22. Slower season.

24 Q. So is this part-time work?

25 A. Yes.

1 (Recess)

2 THE VIDEOGRAPHER: We are back on
3 the record. The time is 11:57 a.m.

4 BY MR. SHAFFER:

5 Q. Okay, Ms. Riggins, we're back on the
6 record, and we were talking before a quick break
7 there about an individual named Dr. Akoda, an
8 individual, and I think you took some issue with
9 calling him Dr. Akoda. Why is that?

10 A. He's not a doctor.

11 Q. And why do you say that?

12 A. Because he doesn't have credentials
13 and certifications to be a doctor.

14 Q. Do you know -- and just so again I
15 want to make sure that we're talking about the same
16 things today so we don't have to go back later on,
17 when we refer to an individual known as Dr. Akoda
18 or the person that you believe is not a doctor
19 about, we're talking about the person that you saw
20 in connection with the birth of your second child;
21 correct?

22 A. Correct.

23 Q. And, at the time that you were being
24 seen by him and actually gave birth with him
25 through C-section, correct?

1 A. Well, there were problems after my
2 pregnancy, after the delivery, I had issues.

3 Q. What were those issues?

4 A. Pain, severe pain in my stomach and
5 my abdominal at work, I would have pain throughout
6 the day. And I couldn't have my tubes tied due to
7 the damaged tissues on my C-section, which caused a
8 lot of pain.

9 Q. And so this is after the birth of
10 Messiah, and Messiah was born by C-section;
11 correct?

12 A. Correct.

13 Q. And you said at a later point in
14 time you wanted to have a tubal ligation and were
15 told you couldn't have one?

16 A. Correct.

17 Q. And you were told it was because of
18 scarring that was present from earlier C-sections?

19 A. Correct.

20 Q. And was that scarring that you say
21 precluded you from having the tubal ligation, that
22 was something you attribute to the C-section
23 Dr. Akoda did?

24 A. Correct.

25 Q. And why do -- why do you do that?

1 George's County on 3/18/2013?

2 A. Yes.

3 Q. What did you have?

4 A. A C-section.

5 Q. That's when Messiah was born?

6 A. Yes.

7 Q. And you can see that this is a
8 two-page record signed by Charles Akoda, M.D. --
9 not signed but his name appears at the end of the
10 document. Correct?

11 A. Yes.

12 Q. And if you look -- well, the top of
13 the page there's a fax server date and time. It
14 says, "3/19/2013 at 2:42:42 p.m."

15 Do you see that?

16 A. Yes.

17 Q. So does this appear to be a record
18 then that would have been created and sent
19 immediately after your C-section with Messiah in
20 March of 2013?

21 MR. ZAJDEL: Objection.

22 A. Yes.

23 Q. That's the date you had the
24 C-section, right, 3/18/2013?

25 A. Yes.

Jasmine Riggins

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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MONIQUE RUSSELL, JASMINE :
RIGGINS, ELSA M. POWELL :
and DESIRE EVANS, : Civil Action No.
Plaintiffs, : 18-5629
v. :
EDUCATIONAL COMMISSION FOR :
FOREIGN MEDICAL GRADUATES, :
Defendant. :
- - - - - X

Volume II
Continued Videotaped Deposition Of JASMINE RIGGINS
Washington, D.C.
Monday, September 16, 2019
9:56 a.m.

Job No. 88391
Pages: 44 - 145
Reported by: Dana C. Ryan, RPR, CRR, CSR (GA)

Jasmine Riggins

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1 A A couple of years ago.

2 Q Was it, you know, talking 2015, 2016?

3 A Yeah, around that time, 2016.

4 Q Okay. Now, is emotional distress the
5 only injury that you're suing for in this lawsuit?

6 A Correct.

7 Q And you're suing ECFMG because you
8 contend that ECFMG is responsible, in whole or in
9 part, for your emotional distress?

10 A Correct.

11 Q Do you also contend that Prince
12 George's Hospital Center is responsible, in whole
13 or in part, for your emotional distress?

14 A Correct.

15 Q Do you also contend that the Maryland
16 Board of Physicians is responsible, in whole or in
17 part, for your emotional distress?

18 A Correct.

19 Q Do you also contend that Dr. Abdul
20 Chaudry is responsible, in whole or in part, for
21 your emotional distress?

22 A Correct.

23 Q Do you also contend that the American
24 Board of Obstetricians and Gynecologists are
25 responsible, in whole or in part, for your

Jasmine Riggins

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1 emotional distress?

2 A Correct.

3 Q So you would say that anyone that you
4 contend did anything to enable Dr. Akoda to
5 practice medicine is responsible, in whole or in
6 part, for your emotional distress?

7 A Correct.

8 Q Tell me about your emotional distress.

9 A I feel angry, sad, embarrassed,
10 ashamed. My emotions are, like, all over the
11 place. I can't even put them into as many words
12 that I can think of. I just can't believe that
13 someone would do that. It's beyond me.

14 Q And when you say "that," what are you
15 referring to?

16 A To pretend to be someone that they're
17 not, to practice something that they had no rights
18 to practice without the proper process of it all.

19 Q And by "proper process of it all," what
20 do you mean?

21 A Going about it the correct way.

22 Q And by "the correct way," you mean
23 what?

24 A Receiving proper documents, being
25 truthful, being honest, doing the things that a

Jasmine Riggins

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1 Q -- in December of 2017?

2 A Yes.

3 Q If we turn to page 3 of that document,
4 paragraph 14, just at the bottom.

5 A Okay.

6 Q You state, Jasmine Riggins was a
7 patient of Oluwafemi Charles Igberase between
8 August 2012 and March 2013 at Dimensions, period.
9 Jasmine Riggins knew Oluwafemi Charles Igberase as
10 Akoda.

11 Is that true to the best of your
12 knowledge?

13 A Yes.

14 Q Turn to page 11, and look at
15 paragraph 66 where you state, Between 2008 and
16 2016, Akoda was an actual and/or apparent, duly
17 authorized agent, servant and/or employee of
18 Dimensions, holding a medical staff position
19 and/or enjoying hospital privileges.

20 Is that true and correct to the best of
21 your knowledge?

22 A Yes.

23 Q I'm sorry?

24 A Yes.

25 Q Okay. Okay. Turn to the next page.

Jasmine Riggins

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1 Q And you have not looked for those;
2 correct?

3 A Correct.

4 Q Why not?

5 A I've had other things going on,
6 unfortunately.

7 Q Is that something that you are still
8 willing to collect and provide to your attorneys
9 to provide to us?

10 A Yes.

11 Q Okay. And just so I'm clear, the
12 things that you think Dr. Akoda did that were
13 wrong are what?

14 A Performing on women, doing C-sections,
15 looking at women's private parts, violating them,
16 touching them, not being honest with them.

17 Q And what is it that you think ECFMG
18 should have done?

19 A Paid attention to his credentials and
20 actually paid attention to him being interviewed
21 under two different names. Just be more careful
22 about their job, pretty much. Be more careful
23 about who they certify.

24 Q And do you know whether or not they
25 identified instances where Dr. Akoda had used